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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

To: The Commission

COMMENTS AND SUPPLEMENT

Television Wisconsin, Inc. ("TV Wisconsin"), by its attorneys and pursuant to the Commission's Public Notice released on December 2, 1997, hereby respectfully submits its Comments and Supplement in response to the ex parte submission of the Association for Maximum Service Television, Inc. and Other Broadcasters (collectively referred to as "MSTV") filed on November 20, 1997. See Public Notice, "FCC Seeks Comment on Filings Addressing Digital TV Allotments," MM Docket No. 87-268; "Ex Parte Submission Based On New Technical Discoveries To Help the Commission Improve The DTV Table of Allotments/Assignments Submitted by the Association for Maximum Service Television, Inc. and Other Broadcasters," MM Docket No. 87-268, November 20, 1997 ("MSTV Submission").

TV Wisconsin, licensee of Television Station WISC-TV (NTSC Ch.3; FCC DTV Ch.50), submits the following Comments and Supplement in order to: (1) support MSTV's efforts to advise and assist the Commission in developing a practicable DTV Table of Allotments as promptly as possible; (2) urge the Commission to review and incorporate proposed DTV channel changes, including the requests of individual stations, in the DTV Table during the reconsideration phase of this proceeding rather than risk delay and confusion

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during the digital television roll-out by putting off consideration of such requests; and (3) propose Channel 29 as an alternative digital television allotment for WISC-TV.

By way of background, on June 13, 1997, TV Wisconsin filed a Petition for Reconsideration ("Petition") of the Commission's decision to allot DTV Channel 50 to WISC-TV. See In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, FCC 97-115, released April 21, 1997, 62 Fed. Reg. 26684 (May 14, 1997) ("Sixth Report and Order"). At the time its Petition was filed, TV Wisconsin could not propose a specific alternative channel because of difficulties in evaluating potential DTV channel allocations in the highly-congested Great Lakes region. Only recently, after exhaustive engineering analyses, was TV Wisconsin able to determine that relocation from DTV Channel 50 to DTV Channel 29 in Madison would comport with the the Commission's requirements and would permit WISC-TV to remain within the so-called "hard" core of spectrum. TV Wisconsin recently re-evaluated and reconfirmed this determination in light of test results reflecting substantial first adjacent DTV-DTV loss of coverage.

Although individual channel change requests such as TV Wisconsin's were not incorporated in the computer-generated channel changes proposed in Exhibit 1A of the MSTV Submission,¹ TV Wisconsin supports MSTV's efforts to provide the Commission with

¹The MSTV Submission places WISC-TV on DTV Channel 50, the same DTV channel assigned to WISC-TV in the Sixth Report and Order.

the information it needs to correct systemic problems in the DTV Table during the reconsideration phase. MSTV's leadership has been and continues to be invaluable in resolving issues which could impede the transition to digital. TV Wisconsin applauds this leadership.

Like MSTV, TV Wisconsin recognizes the need for expediency in finalizing the DTV Table but believes the Commission should to the best of its abilities ensure that the finalized DTV Table reflects appropriate DTV channel change requests. This approach will speed the process of DTV application review and provide the certainty broadcasters need to plan and construct DTV facilities. Once the finalized DTV Table is issued on reconsideration, even streamlined proceedings to accomplish DTV channel changes will create confusion and delay for the subject stations and for broadcasters in adjacent and daisy-chained markets. In short, the Commission should issue the finalized DTV Table once and proceed with application processing with minimal further disruptions.

To this end, TV Wisconsin respectfully requests that its DTV channel allocation be changed from Channel 50 to Channel 29. As demonstrated in the attached Engineering Statement of Thomas M. Eckels, P.E., this proposal satisfies the Commission's DTV-DTV and DTV-NTSC channel spacing requirements and does not create a daisy-chain effect in other markets. Indeed, this is a simple, single channel change request. The proposed change would replace a DTV channel allocation outside the so-called "hard" core of channels with a channel within the core, decreasing the possibility that TV

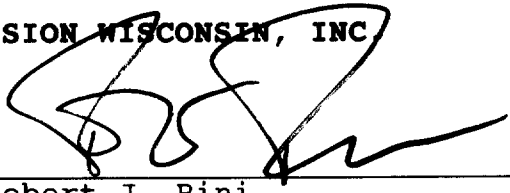
Wisconsin, which is presently authorized for NTSC Channel 3, will be required to build its digital facilities more than once. Adoption of TV Wisconsin's proposal also would level the competitive playing field among broadcasters in Madison by increasing the number of digital channels grouped together.

WHEREFORE, TV Wisconsin offers its general support for the MSTV Submission, urges the Commission to consider and incorporate acceptable individual DTV channel change requests on reconsideration and proposes that WISC-TV be assigned Channel 29 rather than Channel 50 as its DTV channel in Madison, Wisconsin.

Respectfully submitted,

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ENGINEERING STATEMENT

SUPPLEMENT TO PETITION FOR RECONSIDERATION OF
THE SIXTH REPORT AND ORDER
IN MM DOCKET NO. 87-268

TELEVISION WISCONSIN, INC.
STATION WISC-TV
MADISON, WISCONSIN

11/97

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Television Wisconsin, Inc., licensee of NTSC television station WISC-TV, in support of a Supplement to its Petition for Reconsideration of the Sixth Report and Order in MM Docket No. 87-268. Television Wisconsin, Inc. seeks amendment of the Commission's Table of DTV Allotments to substitute DTV Channel 29 for DTV Channel 50 at Madison, Wisconsin.

As outlined in the attached channel study, DTV Channel 29 can be assigned for use by WISC(TV) at Madison in compliance with the Commission's applicable Rules and Regulations concerning the required DTV-to-NTSC and DTV-to-DTV distance separations. For this study the coordinates of the WISC(TV) licensed operation (NL 43° 03' 21" x WL 89° 32' 06") have been used.

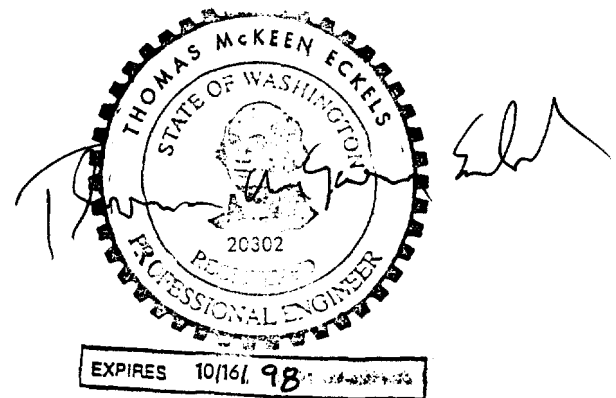
For purposes of this study, it is assumed that the application BPET-960920IP filed by Family Educational Broadcasting, Inc. for a new NTSC station on Channel 29 at Dubuque, Iowa is not entitled to interference protection because it violates the FCC's July 1987 freeze on television applications within the minimum co-channel separation distance of Chicago, Illinois and Milwaukee, Wisconsin. See Order, RM-5811 (Mimeo No. 4074, released July 17, 1987).

Hatfield & Dawson Consulting Engineers

CERTIFICATION

This Engineering Statement, supporting a Supplement to a Petition for Reconsideration of the Table of DTV Allotments in the Sixth Report and Order in MM Docket No. 87-268, has been prepared on behalf of Television Wisconsin, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the State of Washington.

November 19, 1997



Thomas M. Eckels, P.E.

Hatfield & Dawson Consulting Engineers

SEARCH PARAMETERS

TV Database Date: 970820

Channel: 29

Page 1

Latitude: 43 3 21

Longitude: 89 32 6

Zone: I

Safety Zone: 100 km

Job Title: WISC DTV Channel 29

Reference: Sixth R&O in MM DOC 87-268

Call Status	City St	FCC File No.	Chan Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear deg-T	Dist (km)	Not Allowed Between (km)
===== BEGIN SEARCH OF FCC TV DATABASE =====								
WMTV LIC	MADISON WI	BLCT-950711KF	15Z I	955.000 352	43-03- 3 89-29-13	98.1	4.0	(24.1 80.5) CLEAR
WHATV LIC	MADISON WI	BLET-951017KE	*21- I	1120.000 453	43-03-21 89-32- 6	0.0	0.0	(24.1 80.5) CLEAR
ALLOC	OSHKOSH WI	-	22+ II	0.000 0	44-01- 3 88-32-42	36.4	133.5	(24.1 80.5) CLEAR
NEW APP	OSHKOSH WI	BPCT-960920YL	22+ II	5000.000 587	44-23-43 88-35-29	26.7	167.1	(24.1 80.5) CLEAR
REQUESTS A WAIVER OF FREEZE								
WLAX LIC	LA CROSSE WI	BLCT-901115KG	25Z II	562.000 306	43-48-16 91-22-18	299.9	170.4	(24.1 80.5) CLEAR
Directional Antenna								
WLAX APP	LA CROSSE WI	BPCT-960711LD	25Z II	2000.000 299	43-48-16 91-22-18	299.9	170.4	(24.1 80.5) CLEAR
Directional Antenna								
WKOWTV LIC	MADISON WI	BLCT-2219	27+ I	1000.000 381	43-03- 9 89-28-42	94.6	4.6	(24.1 80.5) CLEAR
WKOWTV CP	MADISON WI	BPCT-960607KF	27+ I	5000.000 455	43-03-21 89-32- 6	0.0	0.0	(24.1 80.5) CLEAR
Directional Antenna								
NEW APP	MADISON WI	BPCT-921103KG	27+ I	1320.000 456	43-03-21 89-32- 6	0.0	0.0	(24.1 80.5) CLEAR
MX WITH RENEWAL OF WKOW-TV								
ALLOC	SHEBOYGAN WI	-	28Z II	0.000 0	43-45- 3 87-42-52	61.7	166.5	(9.7 88.5) CLEAR
NEW APP	SHEBOYGAN WI	BPCT-960722KR	28Z I	5000.000 373	43-29- 7 88-13-51	65.2	116.1	(9.7 88.5) CLEAR
REQUESTS A WAIVER OF FREEZE								
ALLOC	DUBUQUE IA	-	*29- II	0.000 0	42-29-55 90-40- 8	236.6	111.5	(0.0 217.3) RESTRICTED

SEARCH PARAMETERS

TV Database Date: 970820

Channel: 29

Page 2

Latitude: 43 3 21

Longitude: 89 32 6

Zone: I

Safety Zone: 100 km

Job Title: WISC DTV Channel 29

Reference: Sixth R&O in MM DOC 87-268

Call Status	City St	FCC File No.	Chan Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear deg-T	Dist (km)	Not Allowed Between (km)
NEW APP REQUESTS A WAIVER OF FREEZE	DUBUQUE IA	BPET-960920IP	*29- II	107.000 109	42-30-14 90-44-55	238.6	116.7	(0.0 217.3) RESTRICTED
NEW APP REQUESTS A WAIVER OF FREEZE.	DAVENPORT IA	BPCT-960710LA	30- II	933.000 360	41-32-49 90-28-35	205.1	184.7	(9.7 88.5) CLEAR
WVCYTV LIC Directional Antenna	MILWAUKEE WI	BLCT-830119KI	30Z I	1070.000 293	43-05-15 87-54-12	87.9	132.9	(9.7 88.5) CLEAR
WHLATV LIC	LA CROSSE WI	BLET-920429KF	*31Z II	1170.000 347	43-48-17 91-22- 6	300.0	170.2	(24.1 80.5) CLEAR
ALLOC IL - SITE 2 MILES WEST	DE KALB IL		*33Z I	0.000 0	41-55-48 88-48- 0	154.0	138.9	(24.1 80.5) CLEAR
WMVT LIC Directional Antenna	MILWAUKEE WI	BLET-810501KE	*36Z I	2340.000 283	43-05-48 87-54-19	87.5	132.8	(24.1 80.5) CLEAR
ADD ID - ALTERNATE CHANNEL	MERIDIAN ID		37Z II	0.000 0	43-36-36 116-23-36	280.9	2179.1	(24.1 80.5) CLEAR
ALLOC SO -	PUERTO PENASCO		37Z II	0.000 0	31-18- 9 113-32-57	246.2	2499.8	(24.1 80.5) CLEAR
ALLOC TA -	CIUDAD GUERRERO		37Z III	0.000 0	26-46-45 99-20-22	209.3	2015.7	(24.1 80.5) CLEAR
===== BEGIN SEARCH OF SUPPLEMENTARY DTV DATABASE 6RO.DTV =====								
WTMJ04 LIC	MILWAUKEE WI	BLCT-2083	28 Origin:F I		43- 5-29 87-54- 7	87.7	133.1	(32.2 88.5) CLEAR
WMAQ05 LIC	CHICAGO IL	BLCT-930715KG	29 Origin:F I		41-52-44 87-38-10	129.4	203.7	(0.0 196.3) CLEAR
WAOW09 LIC	WAUSAU WI	BLCT-870108KH	29 Origin:F II		44-55-14 89-41-31	356.6	207.6	(0.0 196.3) CLEAR

SEARCH PARAMETERS

TV Database Date: 970820

Channel: 29

Page 3

Latitude: 43 3 21

Longitude: 89 32 6

Zone: I

Safety Zone: 100 km

Job Title: WISC DTV Channel 29

Reference: Sixth R&O in MM DOC 87-268

Call Status	City St FCC File No.	Chan ERP(kW) Zone HAAT(m)	Latitude Longitude	Bear deg-T	Dist (km)	Not Allowed Between (km)
WHLA31 LIC	LA CROSSE WI BMLET-920429KF	30 Origin:F II	43-48-17 91-22- 6	300.0	170.2	(32.2 88.5) CLEAR

==== END OF DTV SPACING STUDY FOR CHANNEL 29 =====

CERTIFICATE OF SERVICE

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